## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

SECOND AMENDMENT ARMS, et al.	, )	
Plaintiffs,	)	No. 10-CV-4257
v.	)	Hon. Robert M. Dow, Jr
CITY OF CHICAGO, et al.,	)	
Defendants.	)	

## AGREED MOTION FOR AN EXTENSION OF TIME TO FILE JOINT STATUS REPORT

Plaintiffs Second Amendment Arms, R. Joseph Franzese, and Tony Cole (collectively, "Plaintiffs"), by their attorney, David G. Sigale of the Law Offices of David G. Sigale, P.C., and Defendants City of Chicago, Mayor Rahm Emanuel, Superintendent of Police Eddie Johnson, and City Clerk Anna Valencia (collectively, "Defendants"), by their attorney, Edward N. Siskel, Corporation Counsel (together with Plaintiffs, "Parties"), respectfully move this Court to extend the deadline to file a joint status report previously entered in this matter. In support of this motion, the Parties state as follows:

- 1. In this case challenging various City regulations of gun stores and sales, two claims remain: Count I, which challenges the City's previous but now-repealed ban on gun stores in the City, and seeks damages allegedly suffered by Plaintiff Second Amendment Arms as a result of that ban, and Count III, which challenges the City's ban on the possession and sale of laser sight accessories.
- 2. The Court has ordered the Parties to file a joint status report by October 20, 2017, outlining how they intend to proceed on these remaining claims, with a status hearing to follow on October 27, 2017 at 11 a.m. *See* Dkt. 220. The City's attorneys, however, are still working to

confirm their client's position and secure approval of the report. Therefore, the Parties respectfully request a short extension to complete the status report. The Parties jointly propose that the dates previously entered in this matter be extended by two weeks, as follows:

- 1. Joint status report shall be due by November 3, 2017;
- 2. Status hearing scheduled for October 27, 2017, is stricken and shall be rescheduled for November 9, 2017; November 14, 2017; or another date convenient for the Court.

WHEREFORE, the Parties respectfully request that the Court grant their agreed motion and grant them such further relief as the Court deems just and appropriate.

Date: October 20, 2017 Respectfully submitted,

EDWARD N. SISKEL, Corporation Counsel of the City of Chicago

By: <u>/s/ Ellen W. McLaughlin</u>
Assistant Corporation Counsel

Ellen McLaughlin City of Chicago, Department of Law Constitutional and Commercial Litigation Division 30 North LaSalle Street, Suite 1230 Chicago, Illinois 60602 (312) 742-5147 Attorney for Defendants

Agreed to by: David G. Sigale, Esq. Law Firm of David G. Sigale, P.C. 739 Roosevelt Road, Suite 304 Glen Ellyn, IL 60137 (630) 452-4547 Attorney for Plaintiffs